



By Email

11.2.18

Janet Coit, Director
Department of Environmental Management
janet.coit@dem.ri.gov

Carol Grant, Commissioner
Office of Energy Resources
carol.grant@energy.ri.gov

Meredith Brady, Associate Director
Division of Planning
meredith.brady@doa.ri.gov

Christopher Kearns, Chief of Program Development
Office of Energy Resources
Christopher.kearns@energy.ri.gov

Nancy Hess, Supervising Planner
Division of Planning
nancy.hess@doa.ri.gov

Dear Janet, Carol, Meredith, Chris and Nancy,

We are writing as active members of the Renewable Energy Siting Stakeholder Committee who are working diligently to ensure that Rhode Island develops smart strategies that allow for the deployment of renewable energy in line with our climate goals while also protecting natural resources and community character. We appreciate the time and effort that your agencies' staff and stakeholders have invested in the process to date. We also want to highlight our sense

of urgency for developing and implementing policies, under the state's renewable energy programs, that incentivize the siting of renewables projects in preferred, or least-conflict, areas.

We understand that energy efficiency is key to our energy future and applaud the state's robust energy efficiency and energy conservation programs. We also support solar energy as integral to meeting our state's clean energy goals and addressing climate change. Specifically, we appreciate the addition of the solar carport category and the significant increase in small rooftop capacity in the 2019 Renewable Energy Growth (REG) Program, as well as new funding for brownfield projects in the Renewable Energy Fund. But we are particularly concerned about the lack of strategies to prioritize development of large-scale solar generation in preferred locations and to protect priority farms, forests and open space. As you know, the stakeholder group has been meeting for more than a year. We are eager to see additional steps that will address this difficult issue.

We ask the Office of Energy Resources, Department of Environmental Management and Statewide Planning to quickly develop laws, regulations and policies to maximize rooftop solar on residential and commercial buildings and implement strategies to encourage cost-effective renewables development on commercial and industrial zoned land, on already developed land, and in other locations with environmental alterations such as closed landfills, brownfields and parking lots.

We urge the State to:

- Quickly develop and implement strategies to facilitate the development of solar projects in the priority areas listed above. We believe this may require a combination of strategies in both the Virtual Net Metering and REG programs and we are open to stakeholder suggestions that our goals could be met through changes to the Renewable Energy Standard. We ask the state to consider:
 - strategies to incorporate siting considerations in virtually net metered projects;
 - a limitation on ground-mounted solar projects on contiguous parcels in non-preferred areas;
 - no size limitation on virtually net metered projects in preferred areas;
 - additional strategies at the local level to remove barriers to, and further incentivize through permitting or other processes, siting in least-conflict areas;
 - strategies to expand or reallocate capacity under the REG Program to better reflect siting considerations, giving priority to rooftops, parking lot canopies and other preferred locations, while considering ratepayer impacts.
- Identify strategies to protect areas of environmental concern including priority farm, forest and open space lands, which are critical for protection of wetlands, coastal features, water quality, drinking water supplies, wildlife habitat and connectivity, rare species protection, recreation, climate adaptation and often include historic and cultural assets.

- Ensure that municipalities throughout the state have the tools, capacity and authority to site solar development where it is most appropriate for the community. In parallel with policy developments to encourage development of renewable energy in preferred locations, we support a reasonable timeline for municipalities' adoption of siting ordinances after legislative revisions have been adopted to encourage renewable energy development in preferred locations.
- Recognize, articulate and implement policies to protect the role of natural resources in mitigating and adapting to climate change. The Rhode Island Greenhouse Gas Reduction Plan, in discussing land use conservation strategies as a critical part of climate action, says that Rhode Island could miss its greenhouse gas (GHG) reduction targets under the Resilient Rhode Island Act if the State continues to lose forests, as forests store vast amounts of carbon and reduce the State's net GHG footprint.
- Develop a plan that articulates the siting, size and mix of renewable energy strategies that will allow Rhode Island to achieve aggressive greenhouse gas reduction goals. The plan will identify and quantify the likely renewable capacity that can be produced at preferred land-based and offshore locations and will outline strategies for protecting critical environmental areas.

We appreciate the effort underway to develop guidance for local governments, which is important to providing a predictable and fair process for developing renewable energy projects, and we remain committed to helping ensure that municipalities have the tools, capacity and authority to incentivize solar development in preferred locations so the state can meet its greenhouse gas reduction targets while protecting environmental resources. We believe the state must simultaneously spend time developing consensus-based strategies under its statewide renewable energy programs to ensure that projects in least-conflict areas are prioritized.

Sincerely,

Erika Niedowski
Rhode Island Director
Acadia Center

Ashley V. Sweet
Legislative Liaison
American Planning Association – RI Chapter



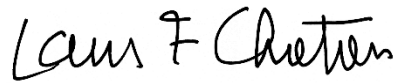
Meg Kerr
Sr. Director, Policy
Audubon Society of Rhode Island



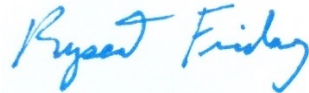
Amy E. Moses
Vice President and RI Director
CLF Rhode Island



Sheila Dormody
Gov't Relations & Cities Program Manager
The Nature Conservancy



Larry Chretien
Executive Director
Green Energy Consumers Alliance



Rupert Friday
Executive Director
Rhode Island Land Trust Council



Scott Millar
Manager, Community Technical Assistance
Grow Smart Rhode Island



Topher Hamblett
Director of Advocacy & Policy
Save the Bay